

#### REMARKS

Claims 15-34 have been rejected under 35 USC 112, first paragraph. Claims 15, 28 and 33 have been amended accordingly.

Applicants respectfully direct the Examiner's attention to paragraphs [0053] and [0054] as disclosing the set up and linking of the three connections (first, second, and third or continuous (represented by SIP, SS7 and DSS1) connections). Here, it is clearly stated that the web/application server S initiates two separate signaling connections, a first SIP[A] to the VoIP subscriber and a second SIP[B], SS7, DSS1 to the subscriber B, and subsequently links these together to form a continuous signal connection SIP, SS7, DSS1 (the first and second connections together). To clarify this point, claims 15, 28 and 33 have been amended to replace "third" with "continuous."

Claims 15-34 have also been rejected under 35 USC 102(e) as anticipated by Vilander. The rejection is respectfully traversed.

As an initial matter, the Examiner has failed to provide any substantive reasons as to why Vilander anticipates the claimed invention. That is, the Examiner has not substantively examined the claimed invention. The Examiner simply makes a general statement, without providing any support, that the reference discloses the invention. Since the Examiner has failed to provide any substantive reasons for rejection the claims as anticipated by Vilander, any forthcoming Office Action may not be made final.

Vilander generally discloses a method of alerting a mobile wireless subscriber registered with a mobile wireless communication network to a session initiation request sent by a calling party. Here, a SIP Invite message is received at a Home SIP server of the mobile network. A SIP URL identifying the mobile subscriber is used to identify a ACP with which the mobile subscriber is currently registered and a paging message is broadcast to the mobile subscriber from the ACP. However, there is no disclosure of linking a first and second connection to form a continuation connection between two subscribers, as required by the claimed invention.

In view of the above, Applicants submit that this application is in condition for allowance.

The Commissioner is hereby authorized to charge deposit account 02-1818 for any fees which are due and owing, referencing Attorney Docket No. 119010-140.

Respectfully submitted,

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